

COMMONWEALTH EDISON COMPANY'S IMPLEMENTATION PLAN

This Plan is being filed pursuant to Illinois Administrative Code, 83 Ill. Adm. Code §280.15, Implementation Plan.

COMED'S IMPLEMENTATION PLAN¹

Section 280.5 Policy

Section 280.10 Exemptions

Section 280.15 Compliance

Section 280.20 Definitions

ComEd anticipates being in full compliance with §280.15 Compliance by May 1, 2016. ComEd anticipates filing its Implementation Plan by January 1, 2015 and updating it every 120 days thereafter. ComEd anticipates publishing its Implementation Checklist to its website after the Plan has been approved and updating it every 30 days thereafter. The other sections (280.5, 280.10, and 280.20) are effected by and incorporated into the remainder of the Rule and therefore completion dates are detailed in each section below.

The expected cost of full implementation of Part 280 is approximately \$21.31M. This cost estimate is preliminary and subject to change.

Section 280.30 Application

ComEd anticipates being in full compliance with the section of the rule in October 2015. The revisions to this section will be implemented in October 2015 due to scheduling of IT changes.

The expected cost of compliance is approximately \$1.42M. This cost estimate is preliminary and subject to change.

In order to implement Section 280.30, ComEd plans to:

Update Tariff	Aug-Oct 2015
Update website	October 2015
Prepare customer correspondence	October 2015
Perform system updates	October 2015
Ensure vendor compliance	October 2015
Begin data collection	October 2015
Update procedures	October 2015
Provide training	Sep-Oct 2015

Section 280.35 Revert to Landlord/Property Management Agreements

¹ ComEd's Implementation Plan provides a description of the work that must be completed for implementation of each section of Part 280. The Plan includes estimated completion dates. ComEd's Implementation Checklist, which will be available at ComEd.com after the Plan is approved by the Commission, describes to customers the changes to the rules and their impact on customers and ComEd. Rules that have not changed or have no impact on customers and ComEd are explained to customers in the Checklist.

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions to this section will be implemented in December 2015 due to scheduling of IT changes. ComEd is currently compliant with §280.35(b) Prearrangement to be in Writing and §280.35(d) Tenant Bills.

The expected cost of compliance is approximately \$360K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.35, ComEd plans to:

Update Tariff	Sep-Dec 2015
Update website	December 2015
Prepare customer correspondence	December 2015
Ensure vendor compliance	December 2015
Update procedures	December 2015
Perform system updates	December 2015
Provide training	Nov-Dec 2015

Section 280.40 Deposits

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions in this section will not be implemented until December 2015, unless otherwise noted, due to scheduling of IT changes. ComEd is currently compliant with §280.40(c) Calculation of Deposit Amounts.

The expected cost of compliance is approximately \$2.70M. This cost estimate is preliminary and subject to change.

In order to implement Section 280.40, ComEd plans to:

Update Tariff	Sep-Dec 2015
Provide training	Sep-Dec 2015
Update customer correspondence	October 2015
Begin data collection	October 2015
Update procedures	October 2015
Perform system updates	October 2015
▪ 280.40(g) Deposit Interest	December 2015
▪ 280.40(j) Records of Deposits	December 2015
Ensure vendor compliance	
▪ 280.40(g) Deposit Interest	December 2015
▪ 280.40(j) Records of Deposits	December 2015
Update Bill	

▪ 280.40(g) Deposit Interest	December 2015
▪ 280.40(j) Records of Deposits	December 2015

Section 280.45 Deposits for Low Income Customers

ComEd anticipates being in full compliance with the section of the rule in June 2015. The revisions to this section will be implemented in June 2015 due to scheduling of IT changes. ComEd is currently compliant with §280.45(b) and §280.45(c).

The expected cost of compliance is approximately \$640K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.45, ComEd plans to:

Create/update procedures	June 2015
Perform system updates	June 2015
Provide training	May-Jun 2015

Section 280.50 Billing

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions to this section will be implemented in December 2015 due to scheduling of IT changes, updates to the bill, and vendor outreach. ComEd is currently compliant with §280.50(b) Billing Cycle, §280.50(d) Bill Delivery, and §280.50(e) Due Dates.

The expected cost of compliance is approximately \$560K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.50, ComEd plans to:

Update Tariff	Nov-Dec 2015
Update website	December 2015
Perform system updates	December 2015
Update bill	December 2015
Ensure vendor compliance	December 2015
Update procedures	December 2015
Provide training	Nov-Dec 2015

Section 280.60 Payment

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions to this section will be implemented in December 2015 due to scheduling of IT changes, updates to the bill, and vendor outreach. ComEd is currently compliant with §280.60(b) Method of Payment, §280.60(c) Late Payment, and §280.60(e) Returned Payments.

The expected cost of compliance is approximately \$90K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.60, ComEd plans to:

Update Tariff	Nov-Dec 2015
Update non-residential bill	December 2015
Ensure vendor compliance	December 2015
Perform system updates	December 2015

Section 280.65 Late Payment Fee Waiver for Low Income Customers

ComEd anticipates being in full compliance with the section of the rule in June 2015. The revisions to this section will be implemented in June 2015 due to scheduling of IT changes.

The expected cost of compliance is approximately \$410K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.65, ComEd plans to:

Perform system updates	June 2015
Update procedures	June 2015
Provide training	May-Jun 2015

Section 280.70 Preferred Payment Date

ComEd anticipates being in full compliance with the section of the rule in October 2015. The revisions to this section will be implemented in October 2015 due to scheduling of IT changes.

The expected cost of compliance is approximately \$620K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.70, ComEd plans to:

Update bill	October 2015
Perform system updates	October 2015

Update procedures	October 2015
Provide training	Sep-Oct 2015

Section 280.80 Budget Payment Plan

ComEd anticipates being in full compliance with the section of the rule in October 2015. The revisions to this section will be implemented in October 2015 due to scheduling of IT changes and updates to the bill. ComEd is currently compliant with §280.80(b) Applicability, §280.80(c) Eligibility, §280.80(d) Offering, §280.80(e) Enrollment, §280.80(f) Bill Itemization, and §280.80(k) Cancellation.

The expected cost of compliance is approximately \$60K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.80, ComEd plans to:

Update bill	October 2015
Perform system updates	October 2015
Update procedures	October 2015
Provide training	Oct-Nov 2015

Section 280.90 Estimated Bills

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions to this section will be implemented in December 2015 due to scheduling of IT changes, updates to the bill, and vendor outreach. ComEd is currently compliant with §280.90(e) Estimated Bill Formula and §280.90(f) Bill Labeling.

The expected cost of compliance is approximately \$1.98M. This cost estimate is preliminary and subject to change.

In order to implement Section 280.90, ComEd plans to:

Update Tariff	Nov-Dec 2015
Update customer correspondence	December 2015
Perform system updates	December 2015
Update bill	December 2015
Ensure vendor compliance	December 2015
Update procedures	December 2015
Provide training	Nov-Dec 2015

Section 280.100 Previously Unbilled Service

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions to this section will be implemented in December 2015 due to scheduling of IT changes.

The expected cost of compliance is approximately \$280K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.100, ComEd plans to:

Perform system updates	December 2015
Update bill	December 2015
Prepare customer correspondence	December 2015
Update procedures	December 2015
Provide training	Nov-Dec 2015

Section 280.110 Refunds and Credits

ComEd anticipates being in full compliance with the section of the rule in February 2016. The revisions to this section will be implemented in February 2016, unless otherwise noted, due to scheduling of IT changes and updates to the bill. ComEd is currently compliant with §280.110(b) Billing Time Period for Refunds and Credits Due to Overcharges Resulting from Utility Error, §280.110(d) Interest on Refunds and Credits, §280.110(f) Credit to Bill Statement or Direct Refund to Customer, and §280.110(g) Time Limit to File Complaint.

The expected cost of compliance is approximately \$2.16M. This cost estimate is preliminary and subject to change.

In order to implement Section 280.110, ComEd plans to:

Update bill	February 2016
Update procedures	February 2016
Perform system updates	February 2016
▪ Automate §280.110(d)	August 2015
Provide training	Jan-Feb 2016

Section 280.120 Deferred Payment Arrangements

ComEd anticipates being in full compliance with the section of the rule in April 2016. The revisions to this section will be implemented in April 2016, unless otherwise noted, due to scheduling of IT changes and updates to the bill. ComEd is currently compliant with §280.120(c) Length of DPA Term, §280.120(f) Down Payment, §280.120(h) Installments, and §280.120(i) Default.

The expected cost of compliance is approximately \$2.25M. This cost estimate is preliminary and subject to change.

In order to implement Section 280.120, ComEd plans to:

Update Tariff	Apr-Jun 2015
Update procedures	June 2015
Prepare/update customer correspondence ▪ §280.120(e)	June 2015
Perform system updates ▪ §280.120(e) & §280.120(j) ▪ §280.120(d)	June 2015 April 2016
Update bill ▪ §280.120(e)	December 2015
Ensure vendor compliance ▪ §280.120(e)	December 2015
Provide training	May-Jun 2015; Apr 2016

Section 280.125 Deferred Payment Arrangements for Low Income Customers

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions to this section will be implemented in December 2015, unless otherwise noted, due to scheduling of IT changes and updates to the bill. ComEd is currently compliant with §280.125(c) Length of DPA Term.

The expected cost of compliance is approximately \$310K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.125, ComEd plans to:

Update procedures	June 2015
Perform system updates ▪ §280.125(b), (d), (e)	June 2015
Update bill	December 2015
Ensure vendor compliance	December 2015
Provide training	May-Jun 2015; Nov-Dec 2015

Section 280.130 Disconnection of Service

ComEd anticipates being in full compliance with the section of the rule in February 2016. The revisions to this section will be implemented in February 2016, unless otherwise noted, due to scheduling of IT changes and vendor outreach. ComEd is currently compliant with §280.130(e) Method of Disconnection Notice Delivery,

§280.130(m) Medical Certification, §280.130(n) Temperature Prohibitions, and §280.130(o) – (r).

The expected cost of compliance is approximately \$3.05M. This cost estimate is preliminary and subject to change.

In order to implement Section 280.130, ComEd plans to:

Update customer correspondence ▪ 280.130(j)	February 2016 April 2015
Perform system update ▪ 280.130(j)	February 2016 April 2015
Ensure vendor compliance	April 2015
Update procedures ▪ 280.130(j)	February 2016 April 2015
Provide training	Mar-Apr 2015; Jan-Feb 2016

Section 280.135 Winter Disconnection of Residential Heating Services, December 1 through March 31

ComEd is compliant with this Section.

Section 280.140 Disconnection for Lack of Access to Multi-Meter Premises

ComEd anticipates being in full compliance with the section of the rule in April 2016. The revisions to this section will be implemented in April 2016 due to scheduling of IT changes. ComEd is currently compliant with this section as a manual process, but plans to automate as outlined below.

The expected cost of compliance is approximately \$2.61M. This cost estimate is preliminary and subject to change.

In order to implement Section 280.140, ComEd plans to:

Perform system update	April 2016
Ensure vendor compliance	April 2016
Begin data collection	April 2016
Update procedures	April 2016
Provide training	Mar-Apr 2016

Section 280.150 Disconnection of Master-Metered Apartment Buildings

ComEd is compliant with this section.

Section 280.160 Medical Certification

ComEd anticipates being in full compliance with the section of the rule in February 2016. The revisions to this section will be implemented in February 2016, unless otherwise noted, due to scheduling of IT changes and updates to its bill. Currently, ComEd is compliant with section §280.160(b) Certified Parties, §280.160(d) Certificate Content, §280.160(f) Restoration, and §280.160(g) Duration of Certificate.

The expected cost of compliance is approximately \$1.02M. This cost estimate is preliminary and subject to change.

In order to implement Section 280.160, ComEd plans to:

Update customer correspondence	August 2015
Update procedures	August 2015
Perform system updates <ul style="list-style-type: none">▪ §280.160(c) & §280.160 (i)▪ MPA identified on bill §280.160(i)	August 2015 December 2015
Update bill <ul style="list-style-type: none">▪ MPA identified on bill §280.160(i)	December 2015 December 2015
Ensure vendor compliance <ul style="list-style-type: none">▪ MPA identified on bill §280.160(i)	December 2015 December 2015
Begin data collection §280.160(h)	February 2016
Provide training	Jul-Aug 2015; Nov-Dec 2015

Section 280.170 Timely Reconnection of Service

ComEd anticipates being in full compliance with the section of the rule in February 2016. The revisions to this section will be implemented in February 2016 due to scheduling of IT changes. ComEd is currently compliant with §280.170(c) Exception for Lack of Access, §280.170(d) Exception for Disconnection not at the Meter or not at the Normal Place of Disconnection, and §280.170(e) Exception for Damage or Unsafe Condition.

The expected cost of compliance is approximately \$280K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.170, ComEd plans to:

Perform system updates	February 2016
Update procedures	February 2016
Provide training	Jan-Feb 2016

Section 280.180 Reconnection of Former Residential Customers for the Heating Season

ComEd anticipates being in full compliance with the section of the rule in October 2015. The revisions to this section will be implemented in October 2015 due to scheduling of updates to its procedure and training. ComEd is currently compliant with §280.180(a), §280.180(b) Limitations, §280.180(c) DPA, §280.180(d), §280.180(g) Survey and Notice to Affected Customers, and §280.180(i).

The expected cost of compliance is approximately \$5K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.180, ComEd plans to:

Update procedures	October 2015
Provide training	Sep-Oct 2015

Section 280.190 Treatment of Illegal Taps

ComEd anticipates being in full compliance with the section of the rule in April 2016. The revisions to this section will be implemented in April 2016 due to scheduling of updates to its correspondence, procedure, and training. ComEd is currently compliant with §280.190(d) Disconnection of Service and §280.190(g) Disconnection of Service.

The expected cost of compliance is approximately \$130K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.190, ComEd plans to:

Update customer correspondence	April 2016
Update procedures	April 2016
Provide training	Mar-Apr 2016

Section 280.200 Tampering

ComEd anticipates being in full compliance with the section of the rule in April 2016. The revisions to this section will be implemented in April 2016 due to scheduling of updates to its procedure and training. ComEd is currently compliant with §280.200(b) Proof, §280.200(c) Investigation, §280.200(d) Notice to Customer, §280.200(f) Timing, and §280.200(g) Record Keeping.

The expected cost of compliance is approximately \$5K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.200, ComEd plans to:

Update procedures	April 2016
Provide training	Mar-Apr 2016

Section 280.205 Non-Residential Tampering

ComEd is compliant with this section.

Section 280.210 Payment Avoidance by Location

ComEd anticipates being in full compliance with the section of the rule in April 2016. The revisions to this section will be implemented in April 2016 due to scheduling of IT changes.

The expected cost of compliance is approximately \$340K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.210, ComEd plans to:

Prepare customer correspondence	April 2016
Perform system updates	April 2016
Begin data collection	April 2016
Create procedures	April 2016
Provide training	Mar-Apr 2016

Section 280.220 Utility Complaint Process

ComEd is compliant with this section.

Section 280.230 Commission Compliant Process

ComEd is compliant with this section.

Section 280.240 Public Notice of Commission Rules

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions to this section will be implemented in December 2015 due to scheduling of updates to its website and bill.

The expected cost of compliance is \$5K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.240, ComEd plans to:

Update website	December 2015
Update bill	December 2015

Section 280.250 Second Language Requirements

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions to this section will be implemented in December 2015 due to scheduling of updates to its website and vendor outreach.

The expected cost of compliance is included is approximately \$5K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.250, ComEd plans to:

Update website	December 2015
Update customer correspondence	December 2015
Ensure vendor compliance	December 2015

Section 280.260 Customer Information Packet

ComEd anticipates being in full compliance with the section of the rule in October 2015. The revisions to this section will be implemented in October 2015 due to scheduling of IT changes and vendor outreach.

The expected cost of compliance is \$10K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.260, ComEd plans to:

Perform system updates	October 2015
Create customer correspondence	October 2015
Ensure vendor compliance	October 2015
Update procedures	October 2015
Update website	October 2015
Provide training	Sep-Oct 2015

Section 280.Appendix A Disconnection Notice

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions to this section will be implemented in December 2015 due to scheduling of IT changes.

The expected cost of compliance is \$5K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.Appendix A Disconnection Notice, ComEd plans to:

Perform system updates	December 2015
Update customer correspondence	December 2015

Section 280.Appendix B Customer Rights

ComEd anticipates being in full compliance with the section of the rule in December 2015. The revisions to this section will be implemented in December 2015 due to scheduling of updates to correspondence.

The expected cost of compliance is \$5K. This cost estimate is preliminary and subject to change.

In order to implement Section 280.Appendix B Customer Rights, ComEd plans to:

Update customer correspondence	December 2015
--------------------------------	---------------

Section 280.Appendix C Public Notice

See Section 280.240 Public Notice of Commission Rules.

Section 280.Appendix D Disconnection Notice Insert for Residential Gas and Electric Customers

ComEd is compliant with this section.